

EC-2000-007
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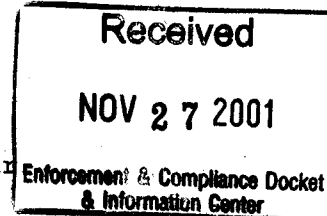
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cc:
Subject: Establishment of Electronic Reporting; Electronic Records (EC-200
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United States Environmental Protection Agency
Enforcement and Compliance Docket and Information Center
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Washington, DC 20460



Subject: Establishment of Electronic Reporting; Electronic Records

SCANA Corporation, an energy-based holding company headquartered in South Carolina, is pleased to submit comments on the EPA's August 31, 2001 proposal concerning electronic reporting and electronic records. SCANA is a \$7 billion energy-based holding company whose businesses include regulated electric and natural gas utility operations, telecommunications and other non-regulated energy-related businesses. SCANA's subsidiaries serve approximately 533,000 electric customers in South Carolina and more than one million natural gas customers in South Carolina, North Carolina and Georgia.

SCANA endorses and supports the EPA's move toward simplification and modernization. We commend the agency for its efforts in introducing electronic reporting for major environmental compliance programs, including reports that must be submitted to state or local agencies under delegated programs. If promulgated, we believe this rule will remove many existing regulatory obstacles to electronic reporting and record keeping for many of the EPA programs, and establish requirements to assure that electronic documents and records are as valid and authentic as paper counterparts. The move towards electronic filing has a great potential to make the duties of the agency, permit applicants, as well as all other participants in the process easier and more efficient.

Additionally, the EPA's proposal appears to be consistent with the agency's desire to reduce the burden on the States and regulated facilities, ensure more accurate environmental data and increase the efficiency of the agency's data collection efforts. We believe this proposal is a crucial step in streamlining environmental reporting as it will improve the integration of environmental information. We envision that creating a national environmental information exchange network as described in the agency's proposal will improve data quality and accuracy, ensure the security of sensitive data, reduce data redundancy, and minimize the burden on those who provide and access information.

Again, SCANA commends the EPA for its initiatives to improve the way the agency collects, manages, and analyzes information.

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